

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JAMES BLOUNT, )  
individually and on behalf of the )  
class defined herein, )  
 )  
Plaintiff, ) No. 08 C 2331  
 )  
v. ) Judge John W. Darrah  
 )  
MIDLAND CREDIT MANAGEMENT, INC., )  
MIDLAND FUNDING NCC-2 CORP., )  
and ENCORE CAPITAL GROUP, INC., )  
 )  
Defendants. )

**NOTICE OF AGREED MOTION**

**TO:** Daniel A. Edelman  
Cathleen M. Combs  
James O. Lattner  
Cassandra P. Miller  
EDELMAN, COMBS, LATTNER & GOODWIN, LLC  
120 South LaSalle Street, 18<sup>th</sup> Floor  
Chicago, Illinois 60603

**PLEASE TAKE NOTICE** that on **Thursday, May 29, 2008**, at **9:00 a.m.**, or as soon thereafter as counsel may be heard, we shall appear before the **Honorable John W. Darrah** or any judge sitting in his stead in **Room 1203**, of the U.S. District Court of the Northern District of Illinois, Eastern Division, 219 South Dearborn St., Chicago, Illinois and shall present the **Agreed Motion for Enlargement of Time to Respond to Plaintiff's Complaint**, a copy of which is attached hereto.

Dated: May 23, 2008

**MIDLAND FUNDING NCC-2 CORP.,  
MIDLAND CREDIT MANAGEMENT, INC.,  
and ENCORE CAPITAL GROUP, INC.**

By: s/ Theodore W. Seitz  
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**CERTIFICATE OF SERVICE**

I hereby certify that on **May 23, 2008**, I electronically filed the foregoing **Notice of Agreed Motion for Enlargement of Time to Respond to Plaintiff's Complaint** with the Clerk of the Court using the ECF system, which sent notification to the following:

Daniel A. Edelman ([courtecl@edcombs.com](mailto:courtecl@edcombs.com))  
Cathleen M. Combs ([ccombs@edcombs.com](mailto:ccombs@edcombs.com))  
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s/ Irina V. Frye

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